

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re

ROYAL INTERCO, LLC, *et. al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 25-10674 (TMH)

Jointly Administered

**NOTICE OF SUCCESSFUL BIDDER, BACK-UP BIDDER, AND AUCTION RESULTS  
FOR THE SALE OF THE ACQUIRED ASSETS**

**PLEASE TAKE NOTICE** that on April 8, 2025, the above-captioned debtors and debtors in possession (the “Debtors”) each filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code in the United States Bankruptcy Court for the District of Delaware (the “Court”).

**PLEASE TAKE FURTHER NOTICE** that on April 8, 2025, the Debtors filed the *Debtors’ Motion for (I) an Order Pursuant to Sections 105, 363, 364, 365 and 541 of the Bankruptcy Code, Bankruptcy Rules 2002, 6004, 6006 and 9007 and Del. Bankr. L.R. 2002-1 and 6004-1 (A) Approving Bid Procedures for the Sale of Substantially All Assets of Debtors; (B) Approving the Debtors’ Entry Into the Stalking Horse Agreement and Related Bid Protections; (C) Approving Procedures for the Assumption and Assignment or Rejection of Designated Executory Contracts and Unexpired Leases; (D) Scheduling the Auction and Sale Hearing; (E) Approving Forms and Manner of Notice of Respective Dates, Times, and Places In Connection Therewith; and (F) Granting Related Relief; (II) an Order (A) Approving the Sale of the Debtors’ Assets Free and Clear of Claims, Liens, and Encumbrances; (B) Approving the Assumption and Assignment or Rejection of Designated Executory Contracts and Unexpired Leases; and (III) Certain Related Relief* (D.I. 15) (the “Sale Motion”)<sup>2</sup>, seeking, among other things, entry of an order approving: (a) the Debtors’ bid procedures (the “Bid Procedures”) in connection with the proposed auction (the “Auction”) for the sale (the “Sale”) of substantially all of the Debtors’ assets (the “Acquired Assets”); (b) approving procedures for the assumption and assignment of executory contracts and unexpired leases in connection with the Sale, including notice of proposed cure amounts (the “Assumption Procedures”); (c) approving the form and manner of notices related to the Sale and Assumption Procedures; and (d) establishing dates and deadlines in connection with the Sale.

**PLEASE TAKE FURTHER NOTICE** that on May 6, 2025, the Court entered an order (D.I. 149) (the “Bid Procedures Order”) granting certain of the relief sought in the Sale

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor’s federal EIN, are as follows: Royal Interco, LLC (7913); Doubletree Paper Mills, L.L.C. (1830); Royal Paper, LLC (9937); and Sun Paper Company, LLC (7899). The Debtors’ mailing address is 711 North 17th Avenue, Phoenix, AZ 85007.

<sup>2</sup> Capitalized terms not defined herein are defined in the Sale Motion.

Motion, including, among other things, approving the (a) Bid Procedures, which established the key dates and times related to the Sale and the Auction, (b) the Debtors' entry into the Stalking Horse Agreement, and (c) the Assumption Procedures.

**PLEASE TAKE FURTHER NOTICE** that pursuant to the Bid Procedures Order, the Court approved Sofidel America Corp. as the Stalking Horse Bidder for substantially all of the Debtors' Assets (the "Acquired Assets") pursuant to the Asset Purchase Agreement, dated as of April 8, 2025.

**PLEASE TAKE FURTHER NOTICE** that the bid deadline for competing Qualified Bids was May 12, 2025, at 4:00 p.m. (prevailing Eastern Time) (the "Bid Deadline"), and the Auction was scheduled for May 15, 2025, at 10:00 a.m. (prevailing Eastern Time).

**PLEASE TAKE FURTHER NOTICE** that in accordance with the Bid Procedures and the Bid Procedures Order, an Auction was held on May 15, 2025, at 10:00 a.m. (prevailing Eastern Time).

**PLEASE TAKE FURTHER NOTICE** that at the conclusion of the Auction, the Debtors, after consulting with the Consultation Parties, selected (i) Sofidel America Corp. as the Successful Bidder with a Successful Bid of \$180,000,000, as will be set forth in definitive documentation, and (ii) Kimberly-Clark Corporation as the Back-up Bidder with respect to the Acquired Assets.

**PLEASE TAKE FURTHER NOTICE** that a hearing (the "Sale Hearing") to consider approval of the Sale and transfer of the Acquired Assets to the Successful Bidder, **free and clear of all liens, claims, interests, and encumbrances**, in accordance with section 363(f) of the Bankruptcy Code, will be held on **May 22, 2025, at 10:00 a.m. (prevailing Eastern Time)** before the Honorable Thomas M. Horan, Bankruptcy Judge, United States Bankruptcy Court for the District of Delaware, at District of Delaware, at 824 Market Street, Wilmington, Delaware 19801. The Sale Hearing may be adjourned from time to time by notice filed on the docket in these chapter 11 cases.

**PLEASE TAKE FURTHER NOTICE** that the deadline to file an objection to the conduct of the Auction, the choice of Successful Bidder and/or Back-Up Bidder is **May 19, 2025, at 11:59 p.m. (prevailing Eastern Time)**. Any such objections must: (i) be in writing, (ii) conform to the applicable provisions of the Bankruptcy Rules, the Local Rules and any orders of the Court, (iii) state with particularity the legal and factual basis for the objection and the specific grounds therefor and (iv) be filed with the Court and served so as to be actually received no later than the applicable objection deadline by the following parties: (a) the Debtors, 711 N. 17th Avenue, Phoenix, AZ 85007, Attn: Michael Ragano (mragano@novo-advisors.com) and Dustin Bernstein (dbernstein@novo-advisors.com); (b) proposed counsel to the Debtors, Morris, Nichols, Arsht & Tunnell LLP, 1201 N. Market Street, 16th Floor, P.O. Box 1347, Wilmington, DE 19899-1347, Attn: Robert J. Dehney, Sr. (rdehney@morrisnichols.com); Matthew O. Talmo (mtalmo@morrisnichols.com); Scott D. Jones (sjones@morrisnichols.com); Clint M. Carlisle (ccarlisle@morrisnichols.com); and Brianna N. V. Turner (bturner@morrisnichols.com); (c) the Office of the United States Trustee for the District of Delaware (the "U.S. Trustee"): 844 King Street, Room 2207, Wilmington, Delaware 19801, Attn: Linda J. Casey

(Linda.Casey@usdoj.gov); (d) counsel to the Official Committee of Unsecured Creditors: (i) Lowenstein Sandler LLP, One Lowenstein Drive, Roseland, New Jersey 07068, Attn: Andrew D. Behlmann (abehlmann@lowenstein.com); Colleen M. Restel (crestel@lowenstein.com); 1251 Avenue of the Americas, New York, NY 10020, Bruce S. Nathan (bnathan@lowenstein.com); and Lindsay H. Sklar (lsklar@lowenstein.com); and (ii) Gellert Seitz Busenkell & Brown, LLC 1201 N. Orange St., Suite 300 Wilmington, Delaware 19801; Attn: Michael Busenkell (mbusenkell@gsbblaw.com); (e) counsel to the Successful Bidder: (i) Cleary Gottlieb Steen & Hamilton LLP, One Liberty Plaza, New York NY 10006, Attn: Sean A. O'Neal (soneal@cgsh.com) and Thomas Kessler (tkessler@cgsh.com) and (ii) Young Conaway Stargatt & Taylor, LLP, Rodney Square, 1000 North King Street, Wilmington, DE 19801, Attn: Sean T. Greecher (sgreecher@ycst.com); and (f) counsel to NXT Capital, LLC: (i) Goldberg Kohn, 55 E Monroe St, Suite 3300. Chicago, IL 60603, Attn: Randall Klein (randall.klein@goldbergkohn.com); Prisca Kim (prisca.kim@goldbergkohn.com); and Eva D. Gadzheva (eva.gadzheva@goldbergkohn.com)

**PLEASE TAKE FURTHER NOTICE** that unless the Court orders otherwise, the Sale Hearing will be an evidentiary hearing on matters relating to the Sale of the Acquired Assets and there will be no further bidding at the Sale Hearing. In the event the Successful Bidder cannot or refuses to consummate the Sale, the Back-up Bidder will be deemed the new Successful Bidder, and the Debtors shall be authorized to proceed with the Sale to the Back-up Bidder pursuant to the Back-up Bid.

**PLEASE TAKE FURTHER NOTICE** that copies of the Sale Motion (and all exhibits thereto), the Bid Procedures Order, and the Bid Procedures (and all exhibits thereto) are available for review free of charge by accessing <https://dm.epiq11.com/RoyalPaper>.

Dated: May 16, 2025  
Wilmington, Delaware

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